UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SDN LIMITED and STEVEN NERAYOFF,

Case No. 24-cv-06089-JMA-AYS

Plaintiffs,

v.

NOTICE OF MOTION

IOV LABS LIMITED, RIF LABS LIMITED, RSK LABS LIMITED, DIEGO GUTIERREZ ZALDIVAR, and ALEJANDRO MARIA ABERG COBO a/k/a ALEX COBO,

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Christopher A. Ott, dated January 3, 2025, the accompanying Memorandum of Law, dated January 3, 2025, and all prior proceedings had herein, Loeb & Loeb LLP ("Loeb") will move this Court, before the Hon. Anne Y. Shields, at the Courthouse located at 100 Federal Plaza, Central Islip, New York 11722, Courtroom 840, as soon as counsel can be heard, for an Order, pursuant to Local Civil Rule 1.4: (1) permitting Loeb to withdraw as counsel of record for Plaintiffs SDN Limited and Steven Nerayoff (collectively, "Plaintiffs"), and discontinuing noticing to Loeb through the CM/ECF system; and (2) temporarily staying all further proceedings in this action to allow Plaintiffs time to retain new counsel.

Dated: New York, New York January 3, 2025

LOEB & LOEB LLP

By: /s/ John Piskora
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